RESPONSE TO FINAL OFFICE ACTION DATED 1/27/2005

REMARKS

Herein, the "Action" or "Office Action" refers to the Office Action identified in the above-identified title.

Applicant respectfully requests reconsideration and allowance of all of the claims of the application. Claims 1-15, 18-26, and 28-35 are presently pending. Claims amended herein are 1, 8, 18, 23, 24, 28, and 29. Claims withdrawn or cancelled herein are 27. New claims added herein are none.

Amendment to Specification

Applicant rescinds its request for specification amendment found in the immediately previous response ("Response to Office Action dated 7/1/2004"). Accordingly, Applicant amends the specification herein in a manner to restore the specification to its original condition before the previous specification amendment request.

Request to Withdraw Finality

Applicant respectfully requests that the Office withdraw the finality of this Office Action. Applicant asserts that the Office has not fully examined each and every claim. Rather, it appears that the Office has lumped together several claims under the same rejection without examining each independent of the other.

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For example, in the previous Office Action, the Office rejected independent claims 8, 13, 23, and 24 for the same reasoning as it rejected claim 1. For example, in its rejection of claim 13, the Office indicates on p. 4 of the previous Action, "As to independent claim 13, the claim incorporates substantially similar subject matter as claim 1 as is rejected along the same rationale."

In its previous Response (p. 22), Applicant stated the following with regard to such blanket anticipation rejections of at least nominally different claims:

> While the Office's assertion (that this claim incorporates substantially similar subject matter as claim 1) may or may not be true, Applicant asserts that this independent claim is patentable different than claim 1; and therefore, it deserves to be examined on its own.

In other words, Applicant is saying that the Office has the burden to show that the cited reference discloses each and every element and feature recited in each rejected claim and show that each element/feature operated together in the manner recited by each rejected claim. Applicant is saying that that the Office has not done that.

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In this Action (p. 4), the Office's rejoinder to the Applicant is as follows:

> In response to applicants' arguments beginning on page 21, with respect to independent claims 8 and 13, While the Office's assertion (that this claim incorporates substantially similar subject matter as claim 1) may or may not be true, Applicant asserts that this independent claim is patentable different that claim 1; and therefore, it deserves to be examined on its own". The Office does not agree these claims are substantially similar, if the applicant argument is that they are patentable different please indicate how the claims are different.

It appears that the Office is saying that the Applicant has the burden to show that the collectively rejected claims are patentably different from each other. Applicant disagrees. Applicant asserts that the burden remains with the Office. Applicant respectfully submits that the Office's refusal to fulfill its burden is sufficient reason for the removal of finality and if finality is not removed, then burden-unfulfillment is sufficient to prevail upon appeal.

However, Applicant will discuss why these collectively rejected claims are patentably different. Doing so will help convince the Office to withdraw the finality of this Action and if not, then will bolster the Applicant's case on appeal.

Below, Applicant reproduces the text of some of the collectively rejected claims in their form before any amendments herein. The differences between the claim itself and claim are highlighted and have comment balloons.

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Please note that the highlighted differences are merely examples of differences. They are not intended to exhaust all possible differences between these claims.

Before amendments herein, claim 1 recited:

> A method for accommodating a legacy application, the method comprising:
>
> obtaining a request for a high-level credential from a legacy application;
>
> marshalling the requested credential;
>
> returning the marshaled credential to the application.

Applicant asserts that claim 8 recites at least three elements/features that are not recited in claim 1. Before amendments herein, claim 8 recited:

> In a computing environment where processes have a provision for low-level credentials but have no provision for high-level credentials, a method for accommodating such processes comprising :
>
> obtaining a request for a credential from a process, wherein the requested credential is a high-level credential;
>
> retrieving the requested credential from a database;
>
> converting the requested high-level credential into a format approximating a low-level credential and representative of the requested high-level credential;
>
> returning the converted credential to the process.

Comment [kcc1]: Claim 1 does not recite this.

Comment [kcc2]: Claim 1 does not recite a "retrieving" action.

Comment [kcc3]: On p. 4 of this Action, the Office states that the term "marshalling" (as used in claim 1) has the same meaning as "passing or transferring." If so, then the "converting" is not the same as "passing or transferring."

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Applicant asserts that claim 13 recites at least three elements/features that are not recited in claim 1. Before amendments herein, claim 13 recited:

> A method for authenticating a user to a network, the method comprising:
>
> obtaining a request for a credential to authenticate the user to access a resource within the network, wherein the resource requires an appropriate credential before the user may access the resource;
>
> locating the appropriate credential;
>
> returning the appropriate credential to the resource within the network, so that the resource allows the user to access such resource;
>
> wherein the obtaining, locating, and returning are performed without user interaction so that the user need not be aware that such steps are being performed.

Comment [kcc4]: Claim 1 does not specifically call out this feature/element.

Comment [kcc5]: No recitation in claim 1 of a "locating" action.

Comment [kcc6]: Again, not recited in claim 1.

Comment [kcc7]: Claim 1 never mentions "user interaction"

In addition to the above-identified examples of features/elements recited in claims 8 and 13 that are not recited in claim 1, Applicant also asserts that the Office has indirectly indicated that these claims have patentable differences.

If these collectively rejected claims (having the same statutory class) truly possess no patentable difference amongst them, then they would be identical. The Office cannot grant the Applicant multiple identical claims in the same statutory class.

It appears that the Office is examining (albeit in a cursory manner) claims 1, 8, and 13, all of which are the same statutory class. However, the

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Office has not indicated that these same-statutorily-classified claims are identical to each other. Instead, the Office's examination of these claims implies that the Office views these claims as being patentably different from each other.

Further proof that the Office considers these claims to be different is that fact that the Office indicated in its Actions that these collectively rejected claims were "substantially similar" rather than identical or nearly identical. So, at its own admission, the Office does not view these claims as identical.

Accordingly, in showing actual differences between the claims and in showing the Office's indirect indication of claim differences, Applicant has met the burden set by the Office (which burden the Applicant maintains that it does not have) to show patentable difference between these collectively rejected claims.

Applicant respectfully requests that the Office remove finality and give Applicant a fully opportunity to respond to the rejections of each claim.

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Substantive Claim Rejections

Claim Rejections under §§ 102 & 103

The Office rejects all of the pending claims under §102 and/or §103. For the reasons set forth below, the Office has not shown that cited references anticipate (under §102) the rejected claims. For the reasons set forth below, the Office has not shown made a *prima facia* case showing that the rejected claims are obvious (under §103). Accordingly, Applicant respectfully requests that the rejections be withdrawn and the case be passed along to issuance.

The Office's rejections are based upon the following references:

- **Olden**: *Olden.,* US Patent No. 6,460,141 (issued 10/1/2002); and/or
- **McNabb**: *McNabb et al.*, US Patent No. 6,289,462 (issued 9/11/2001).

Overview of the Application

The Application describes a domain-authentication aware technology for managing credentials. In other words, an authentication by one resource in a trust network enables automatic (without manual user input) authenticated access to all resources in that trust network.

With an implementation of this technology, concurrent authentications with multiple independent networks (e.g., domains) may be established and maintained.

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With an implementation of this technology, a credential manager provides a credential model retrofit for legacy applications that only understand the password model. The manager marshals high-level credentials (such as a certificate) so that the high-level credential appears to be a low-level credential (such as a user/password) to legacy applications.

With an implementation of this technology, a credential manager provides a mechanism where the application is only a "blind courier" of credentials between the trusted part of the OS to the network and/or network resource. The manager fully insulates the application from "read" access to the credentials.

Cited References

The Office cites **Olden** as its primary references in its anticipation- and obviousness-based rejections. The Office cites **McNabb** as its secondary reference in its obviousness-based rejection.

Olden

Olden describes a security and access management technology for Web-enabled and non-Web-enabled applications and content on a computer network. **Olden** describes a management model which brings together disparate infrastructure components, consolidates multiple security policies, and embraces both Web and emerging Internet technologies to properly address the security requirements of the Web.

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Olden describes a uniform access management model to address the specific problems facing the deployment of security for the Web and non-Web environment. Unified access management consists of strategic approaches to unify all key aspects of Web and non-Web security policies, including access control, authorization, authentication, auditing, data privacy, administration, and business rules. Unified access management also addresses technical scalability requirements needed to successfully deploy a reliable unified Web and non-Web security system.

Olden describes the technology required to support these key factors as they relate to Web and non-Web security. The described system operates in combination with network and system security tools such as firewalls, network intrusion detection tools, and systems management tools to provide comprehensive security for the Web-enabled enterprise.

McNabb

McNabb describes a technology for providing a trusted server which controls access to the execution of processes by applying file level extended sensitivity label attributes. The attributes are utilized to restrict execution of processes that are requested by comparing the extended attributes in addition to using standard file permission authorization.

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Anticipation Rejections

Based upon Olden

The Office rejects claims 1-2, 4-8, 10-24, and 26-35 under USC § 102(e) as being anticipated by **Olden**. Applicant respectfully traverses the rejections of these claims. Based on the reasons given below, Applicant asks the Office to withdraw its rejection of these claims.

Claim 1

As amended, this claim recites:

> A method for accommodating a legacy application, the legacy application having provisions for a low-level credential authorization model which employs username-and-password based authorization, the method comprising:
>
> obtaining a request for a high-level credential from a legacy application, wherein a high-level credential authorization model does not employ username-and-password based authorization;
>
> marshalling the requested high-level credential, the marshalling is characterized by converting a description of the high-level credential into a format recognizable as a low-level credential by the legacy application employing a low-level credential authorization model;
>
> returning the marshaled credential to the legacy application.

The underscored text indicates the primary amendments to this claim which are done to clarify the meaning of "high-level credential" and "marshalling" and introduce "low-level credential."

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In its rejection, Office indicates the following:

> **As to independent claim 1, "A method for accommodating a legacy application, the method comprising: obtaining a request for a high-level credential from a legacy application; marshalling the requested credential; returning the marshaled credential to the application"** is taught in '141 col. 25, lines 29-39.

Applicant submits that the Office has not identified, with particularity, where each feature and element of this claim is found in the cited passage of the reference. Specifically, the Office has not shown where **Olden** discloses "high-level credentials" and "marshalling" as recited in this claim.

High-Level Credential

The cited portion (col. 25, lines 29-39) of **Olden** reads:

> For example, consider that user Steve may have one username/password for Web applications and a different username and password for a legacy application. Single sign on from the Web to the legacy application can be accommodated by storing the user's legacy credentials as user properties for Steve such as legacy_username and legacy_password in the entitlements database 32. The legacy Web application would then query the API and request the legacy_username and legacy_password for ct_username=steve. The results can then be transferred to the legacy application to be used in the logon procedure. Since this is performed programmatically, the user is not aware of the second logon process. To the user, it seems as if he or she only logged onto the Web site once.

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A non-password authorization model (e.g., a X.509 Certificates) utilizes *high-level credentials.* However, most legacy applications have provisions for only the traditional username/password authorization model which is an example of a *low-level credential.*

This distinction between high- and low-level credentials is discussed through-out the Application. For example, this distinction is noted in the following section quoted the 3rd paragraph of the "Summary" on p. 5 of the Application:

> With an implementation of this technology, a credential manager provides a credential model retrofit for legacy applications that only understand the password model. The manager marshals high-level credentials (such as a certificate) so that the high-level credential appears to be a low-level credential (such as a user/password) to legacy applications.

This claim recites (with emphasis added): "obtaining a request for a *high-level credential* from a legacy application."

Applicant submits the **Olden** does not do this. Instead, with **Olden**, authorization to access a first set of functionality based upon a traditional low-level credential (username/password pair) allows for automatic authorized access to a second set of functionality. This automatic secondary access is predicated upon the first authorization and is accomplished by retrieval of a databased low-level credential for this authorized access to a second set of functionality.

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While Olden handles multiple credentials and allows for automatic access to additional functionality based upon authorization via only one set of credentials, Olden ONLY handles low-level credentials. It only handles the traditional username/password pair model. Applicant submits that Olden never discloses utilizing *high-level credentials*. Applicant submits that Olden never discloses utilizing certificates.

In its "Response to Arguments" on p. 3 of the Action, the Office responded to Applicant's argument with the following:

> In response to applicant's argument beginning on page 17, line 22 "the Applicant submits that the Office has not identified with particularity, where each feature and element of this claim is found in the cited passage of the reference ... each feature and element of this claim," such as "High-Level Credential". The Office disagrees with argument although the term "High-Level Credential" is used this can have the same meaning as "password" or user name. Likewise, as the reference indicates smart rules can be used to set further limits on the distribution of credentials.
>
> Also in response to applicant's argument that the references fail to show certain features of applicant's invention, it is noted that the features upon which applicant relies (i.e., X.509) are not recited in the rejected claim(s), until claim 3, which is not incorporated in the independent claim or the other dependent claims. Although the claims are interpreted in light of the specification, limitations from the specification are not read into the claims. See *In re Van Geuns*, 988 F.2d 1181, 26 USPQ2d 1057 (Fed. Cir. 1993). Likewise claim 3, X.509 certificates was rejected under 35 U.S.C. 103 with the combination of references cited in the Office Action.

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In response, Applicant amends to clarify terms recited in this claim. As amended, this claim includes text clarifying the meaning of "high-level" and "low-level" credentials. In particular, the additions clarify that "high-level" credentials does not include the traditional username/password pair authorization model, which is what **Olden** discloses. Thus is amendment clarifies the difference between this claim and what **Olden** discloses.

Therefore, Applicant submits that **Olden** does not disclose "a request for a high-level credential," as recited in this claim.

Marshalling

Furthermore, Olden does not disclose "marshaling" as recited in this claim. Specifically, this claim recites (with emphasis added): "*marshalling* the requested [high-level] credential; returning the *marshaled credential* to the application."

Pages 12-15 of the Application describe the concepts of "marshalling" and "marshaled credentials" in some detail. In the first paragraph on p. 12, this definition is provided: "Marshaling is the mechanism by which a description of a non-password credential can be passed to the TCB [Trusted Computing Base] using an interface designed to support only password credentials."

In its "Response to Arguments" on p. 4 of the Action, the Office responded to Applicant's argument with the following:

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In response to applicant's argument beginning on page 20, the Office has not identified with particularity, where each feature and element of this claim is found in the cited reference" such as "Marshalling". The Office disagrees the term "marshaling" has the same meaning as passing or transferring. The Office Action shown this in the cited passage where the results are "transferred to the legacy application".

In response, Applicant amends to clarify terms recited in this claim. As amended, this claim includes text clarifying the meaning of "marshalling." In particular, the additions clarify that "marshalling" means more than simply "passing" or "transferring," which the Office indicates that **Olden** discloses. Thus is amendment clarifies the difference between this claim and what **Olden** discloses.

Therefore, Applicant submits that **Olden** does not disclose the concepts of "marshalling" and "marshaled credentials," as recited in this claim.

As shown above, **Olden** does not disclose all of the claimed elements and features of the claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claims 2-7

These claims ultimately depend upon independent claim 1. As discussed above, claim 1 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant

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submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

Claim 8

The Office indicates that this claim incorporates substantially similar subject matter as claim 1 and is rejected along the same rationale.

If this is true, the Applicant submits that this claim is allowable for same reasons given above as to why claim 1 is allowable.

While the Office's assertion (that this claim incorporates substantially similar subject matter as claim 1) may or may not be true, Applicant asserts that this independent claim is patentable different than claim 1; and therefore, it deserves to be examined on its own.

As shown above, **Olden** does not disclose all of the claimed elements and features of the claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claims 9-12

These claims ultimately depend upon independent claim 8. As discussed above, claim 8 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

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Claim 13

The Office indicates that this claim incorporates substantially similar subject matter as claim 1 and is rejected along the same rationale.

If this is true, the Applicant submits that this claim is allowable for same reasons given above as to why claim 1 is allowable.

While the Office's assertion (that this claim incorporates substantially similar subject matter as claim 1) may or may not be true, Applicant asserts that this independent claim is patentable different than claim 1; and therefore, it deserves to be examined on its own.

As shown above, **Olden** does not disclose all of the claimed elements and features of the claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claims 14-15

These claims ultimately depend upon independent claim 13. As discussed above, claim 13 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

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Claim 18

As amended, this claim recites (in part):

the TCB comprises:

a credential management module configured to receive requests from the UTCL for a high-level credential for a resource, the high-level credential being associated with a user and not being username-and-password based authorization;

The underscored text indicates the primary amendments to this claim which are done to clarify the meaning of "high-level credential."

In its rejection, Office indicates the following:

As to independent claim 18, "A credential management architecture, comprising: a trusted computing base (TCB) that has 111 access to persisted credentials, the TCB being configured to interact with an entrusted computing layer (UTCL) that accesses the persisted credentials via the TCB; the TCB comprises: a credential management module configured to receive requests from the UTCL for a high level credential for a resource" is taught in '141 col. 3, lines 39-61;

"the high level credential being associated with a user; a credential database associated with the user, wherein credentials are persisted within the database; the credential management module being configured to retrieve credentials from the database" is shown in '141 col. 4, lines 27-34.

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Applicant submits that the Office has not identified, with particularity, where each feature and element of this claim is found in the cited passage of the reference. Specifically, the Office has not shown where **Olden** discloses "high-level credentials" as recited in this claim.

The cited portions of **Olden** read:

> The security and access management system of the present invention, generally indicated by the numeral 10 in FIG. 1, is a highly scalable, reliable, and configurable security architecture. As shown in FIG. 1, the architecture for the security and access management system 10 comprises five main components: at least one authorization component 12; an entitlements (database) server component 14; an API server 16; an administrative client (graphical user interface) 18; and at least one enabled Web server 20 connected to the remainder of the computer network, for example, over the Internet. The first three components are server-side components. Each of the server-side components will now be described in more detail.
>
> The authorization component 12 performs authorization processing on behalf of either an enabled Web server 20 or an API client 22. The authorization component 12 comprises an authorization server 24. Preferably, as shown in FIG. 1, the authorization component 12 comprises a plurality of authorization servers 24A, 24B, 24C and at least one authorization dispatcher 26. In order to avoid a single point source of failure, a plurality of authorization dispatchers 26A, 26B also preferably comprises the authorization component 12. [col. 3, lines 39-61]
>
> ...
>
> The entitlements server component 14 performs database processing on behalf of at least one entitlements manager administrative client 18 and the API server 16. In addition, the entitlements server component 14 also forwards requests from the entitlements manager administrative client 18 and API server 16 to the authorization servers 24A, 24B, 24C comprising the authorization component 12. [col. 4, lines 27-34]

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A non-password authorization model (e.g., a X.509 Certificates) utilizes *high-level credentials.* However, most legacy applications have provisions for only the traditional username/password authorization model which is an example of a *low-level credential.*

This distinction between high- and low-level credentials is discussed through-out the Application. For example, this distinction is noted in the following section quoted the 3rd paragraph of the "Summary" on p. 5 of the Application:

> With an implementation of this technology, a credential manager provides a credential model retrofit for legacy applications that only understand the password model. The manager marshals high-level credentials (such as a certificate) so that the high-level credential appears to be a low-level credential (such as a user/password) to legacy applications.

This claim recites (with emphasis added): "a credential management module configured to receive requests from the UTCL for a *high-level credential* for a resource."

Applicant submits the **Olden** does not do this. Instead, with **Olden**, authorization to access a first set of functionality based upon a traditional low-level credential (username/password pair) allows for automatic authorized access to a second set of functionality. This automatic secondary access is predicated upon the first authorization and is accomplished by retrieval of a databased low-level credential for this authorized access to a second set of functionality.

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While Olden handles multiple credentials and allows for automatic access to additional functionality based upon authorization via only one set of credentials, Olden ONLY handles low-level credentials. It only handles the traditional username/password pair model. Applicant submits that Olden never discloses utilizing *high-level credentials*. Applicant submits that Olden never discloses utilizing certificates.

Therefore, Applicant submits that **Olden** does not disclose "a request for a high-level credential," as recited in this claim.

In its "Response to Arguments" on pp. 4-5 of the Action, the Office responded to Applicant's argument with the following:

> In response to applicant's argument beginning on page 23, with respect to claim 18 "This distinction between high- and low-level credentials is discussed through-out the Application ... Applicant submits the Olden does not do this. Instead, with Olden authorization to access a first set of functionality based upon low-level credential (username/password pair) ... Olden ONLY handles low-level credentials". The Office disagrees with argument as stated previously. A. The term high- or low-level credentials can have the same meaning as a current password verse and old password, or a user passing successful authentication. In addition as stated previously while the claims are interpreted in light of the specification, limitations from the specification are not placed into the claims. If the applicant wants to distinguish high-level credentials as X.509 this should be included in the independent claim.

In response, Applicant amends to clarify terms recited in this claim. As amended, this claim includes text clarifying the meaning of "high-level credential." In particular, the additions clarify that "high-level" credentials does not include the traditional username/password pair authorization

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model, which is what **Olden** discloses. Thus is amendment clarifies the difference between this claim and what **Olden** discloses.

Therefore, Applicant submits that **Olden** does not disclose "a credential management module configured to receive requests from the UTCL for a *high-level credential* for a resource," as recited in this claim.

As shown above, **Olden** does not disclose all of the claimed elements and features of the claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claims 19-22

These claims ultimately depend upon independent claim 18. As discussed above, claim 18 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

Claim 23

The Office indicates that this claim incorporates substantially similar subject matter as claim 1 and is rejected along the same rationale.

If this is true, the Applicant submits that this claim is allowable for same reasons given above as to why claim 1 is allowable.

While the Office's assertion (that this claim incorporates substantially similar subject matter as claim 1) may or may not be true,

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Applicant asserts that this independent claim is patentable different than claim 1; and therefore, it deserves to be examined on its own.

As shown above, **Olden** does not disclose all of the claimed elements and features of the claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claim 24

The Office indicates that this claim incorporates substantially similar subject matter as claim 8 and is rejected along the same rationale.

If this is true, the Applicant submits that this claim is allowable for same reasons given above as to why claim 1 is allowable.

While the Office's assertion (that this claim incorporates substantially similar subject matter as claim 8) may or may not be true, Applicant asserts that this independent claim is patentable different than claim 1; and therefore, it deserves to be examined on its own.

As shown above, **Olden** does not disclose all of the claimed elements and features of the claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claims 25, 26, and 28

These claims ultimately depend upon independent claim 24. As discussed above, claim 24 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant

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submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

Claim 29

As amended, this claim recites (in part):

> a request obtainer configured to obtain a request for a high-level credential to authenticate the user to access a resource within the network, wherein the resource requires an appropriate credential before the user may access the resource, wherein a high-level credential do not utilize username-and-password based for high-level credential authorization;
>
> a credential retriever configured to retrieve the appropriate high-level credential from a database of credentials;
>
> a credential marshaller configured to generate a representation of the high-level credential that is formatted as a low-level credential so that it appears to be a conventional username/password pair, wherein a low-level credential utilizes username-and-password based authorization;
>
> a credential returner configured to return the marshaled credential to the resource within the network, so that the resource allows the user to access such resource;
>
> wherein the obtainer, retriever, marshaller, and returner are further configured to operate without user interaction.

The underscored text indicates the primary amendments to this claim which are done to clarify the meaning of "high-level credential" and "low-level credential."

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In its rejection, Office indicates the following:

As to independent claim 29, "A system for authenticating a user to a network, the system comprising: a request obtainer configured to obtain a request for a high level credential to authenticate the user to access a resource within the network" is taught in '141 col. 3, lines 39-61;

"wherein the resource requires an appropriate credential before the user may access the resource; a credential retriever configured to retrieve the appropriate high-level credential from a database of credentials; a credential marshaller configured to generate a representation of the high-level credential that is formatted as a low-level credential so that it appears to be a conventional username/password pair; a credential returner configured to return the marshaled credential to the resource within the network, so that the resource allows the user to access such resource" is shown in '141 col. 4, lines 27-34;

"wherein the obtainer, retriever, marshaller and returner are further configured to operate without user interaction" is disclosed in '141 col. 25, lines 39-41.

Applicant submits that the Office has not identified, with particularity, where each feature and element of this claim is found in the cited passage of the reference. Specifically, the Office has not shown where **Olden** discloses "high-level credentials" as recited in this claim.

A non-password authorization model (e.g., a X.509 Certificates) utilizes *high-level credentials.* However, most legacy applications have provisions for only the traditional username/password authorization model which is an example of a *low-level credential.*

This distinction between high- and low-level credentials is discussed through-out the Application. For example, this distinction is noted in the

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following section quoted the 3rd paragraph of the "Summary" on p. 5 of the Application:

> With an implementation of this technology, a credential manager provides a credential model retrofit for legacy applications that only understand the password model. The manager marshals high-level credentials (such as a certificate) so that the high-level credential appears to be a low-level credential (such as a user/password) to legacy applications.

This claim recites (with emphasis added): "a request obtainer configured to *obtain a request for a high-level credential to authenticate the user to access a resource within the network*, wherein the resource requires an appropriate credential before the user may access the resource, *wherein a high-level credential do not utilize username-and-password based for high-level credential authorization*."

Applicant submits the **Olden** does not do this. Instead, with **Olden**, authorization to access a first set of functionality based upon a traditional low-level credential (username/password pair) allows for automatic authorized access to a second set of functionality. This automatic secondary access is predicated upon the first authorization and is accomplished by retrieval of a databased low-level credential for this authorized access to a second set of functionality.

While Olden handles multiple credentials and allows for automatic access to additional functionality based upon authorization via only one set of credentials, Olden ONLY handles low-level credentials. It only handles

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the traditional username/password pair model. Applicant submits that Olden never discloses utilizing *high-level credentials*. Applicant submits that Olden never discloses utilizing certificates.

In its "Response to Arguments" on pp. 5-6 of the Action, the Office responded to Applicant's argument with the following:

> In response to applicant's argument beginning on page 29, with respect to claim 29, the applicant proposes the same arguments that were previously presented concerning "High-Level Credential" and "Marshalling". The Office disagrees with these arguments as previously indicated. The Office disagrees with argument although the term "High-Level Credential" is used this can have the same meaning as "password" or user name. Likewise, as the reference indicates smart rules can be used to set further limits on the distribution of credentials. It is noted that the features upon which applicant relies (i.e., X.509) are not recited in the rejected claim(s), until claim 3, which is not incorporated in the independent claim or the other dependent claims. The Office disagrees the term "marshaling" has the same meaning as passing or transferring.

In response, Applicant amends to clarify terms recited in this claim. As amended, this claim includes text clarifying the meaning of "high-level" and "low-level" credentials. In particular, the additions clarify that "high-level" credentials does not include the traditional username/password pair authorization model, which is what **Olden** discloses. Thus is amendment clarifies the difference between this claim and what **Olden** discloses.

Therefore, Applicant submits that **Olden** does not disclose "a request obtainer configured to *obtain a request for a high-level credential to authenticate the user to access a resource within the network*, wherein the resource requires an appropriate credential before the user may access

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the resource, *wherein a high-level credential do not utilize username-and-password based for high-level credential authorization*," as recited in this claim.

As shown above, **Olden** does not disclose all of the claimed elements and features of the claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claims 30-31

These claims ultimately depend upon independent claim 29. As discussed above, claim 29 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

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Claim 32

This unamended claim for an application programming interface (API) method recites:

- **receiving a CredUI-promptfor-credentials call having a set of parameters comprising a TargetName, Context, AuthFlags, and Flags;**
- **parsing the call to retrieve the parameters to determine a specified resource;**
- **obtaining a credential;**
- **associating the credential with the specified resource;**
- **persisting the credential into a database while maintaining the credential's association with the specified resource.**

The Office cites col. 3, lines 39-61 and col. 9, line 27 through col. 10, line 36 of **Olden** and, by doing so, indicates that the cited portion of the reference discloses all of the elements and features of this claim.

However, the Applicant submits that the Office has not identified, with particularity, where each feature and element of this claim is found in the cited passage of the reference. Furthermore, the Office has not provided any reasoning, explanation, or rationale as to its assertion that the cited portions of **Olden** disclose all of each feature and element of this claim,

In particular, the Office has not identified, nor can Applicant find, where **Olden** discloses "receiving a CredUI-promptfor-credentials call having a set of parameters comprising a TargetName, Context, AuthFlags,

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and Flags." No where does **Olden** disclose a call with these particular set of parameters.

In its "Response to Arguments" on pp. 6-7 of the Action, the Office responded to Applicant's argument with the following:

> In response to applicant's arguments beginning on page 33, with respect to claim 32, "In particular, the Office has not identified, nor can Applicant find, where Olden discloses "receiving a CredUI-promptfor-credentials call having a set of parameters comprising a TargetName, Context, AuthFlags and Flags". The Office disagrees the reference shows many examples of these steps, for exampled see col. 9, lines 27-51 "During a request" same meaning as "CredUI-promptfor-credentials"
>
> "different application functions 84 to which the customer has access rights, and returns the correct interface which support the function set" has the same meaning as "set of parameters"
>
> as well as see col. 17, line 65 through col. 18, line 59 "Smart rules are filters that govern user access to applications. When a smart rule is defined for an application in order to determine authorization, the security and access management system 10 examines a property for a specific user, and grants or denies access to an application resource based on the value found" has the same meaning as "TargetName, Context, AuthFlags, and Flags"

In response, Applicant points to the specificity of the claim recitation. In particular, this claim indicates that the received call has a defined set of parameters that comprise the following specifically recited parameters: "TargetName, Context, AuthFlags, and Flags."

It appears to the Applicant that the Office is combining two extrapolated and generalized conclusions about Olden and equating it to a

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very specific and explicit recitation in the claim language. If the Office is correct then these two statements are equivalent:

The following is a direct quote from this claim:

> ...receiving a CredUI-promptfor-credentials call having a set of parameters comprising a TargetName, Context, AuthFlags, and Flags...

The following is the same quoted language but Applicant has replaced the language that the Office equates to being disclosed in **Olden** (minor edits are done to make the replaced language make better grammatical sense):

> ... receiving a request [a CredUI-promptfor-credentials call] having a correct interface to support the function set to which the customer has access rights, [a set of parameters] comprising filters governed by smart rules (when a smart rule is defined for an application in order to determine authorization, the security and access management system examines the property of a specific user and grants or denies access to an application resource based on the value found) [a TargetName, Context, AuthFlags, and Flags]...

Again, if **Olden** truly discloses the language recited in this claim, then the above two statements would be identical in meaning. Not only would they be identical they would be neither broader nor narrower than each other in meaning.

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Applicant hopes that the reader of this can see that these two statements are not identical. Even assuming the best case for the Office, **Olden**, at best, discloses a generalization of the recited language. But, of course, Applicant does not think that **Olden** even discloses that.

Applicant asks the Office to identify, with particularity, where **Olden** discloses each of these parameters which have been expressly recited in this claim. Where does **Olden** expressly disclose a "TargetName" parameter? Where does **Olden** expressly disclose a "Context" parameter? Where does **Olden** expressly disclose a "AuthFlags" parameter? Where does **Olden** expressly disclose a "Flags" parameter?

Furthermore, Applicant submits that **Olden** does not disclose the all of the steps of this method (parsing a call; obtaining a credential; associating; and persisting) generally or specifically. For example, **Olden** does not disclose "associating the [obtained] credential with the specified resource."

If **Olden** does disclose these things, Applicant asks that the Office identify where it discloses it with particularity.

In its "Response to Arguments" on p. 7 of the Action, the Office responded to Applicant's argument with the following:

> In response to applicant's argument on page 34, with respect to claim 32, "Furthermore, Applicant submits that Olden does not disclose the all of the steps of this method (parsing a call; obtaining a credential; associating; and persisting) generally or specifically". The Office disagrees this is shown throughout the reference see col. 17, line 65 through 18, line 59 above. Note database processing performs the tasks Applicant is claiming, i.e. parsing, obtaining, associating, persisting ect.

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In response, Applicant points out that the Office did not point out, with particularly, where Olden expressly discloses the steps of this method (parsing a call; obtaining a credential; associating; and persisting). Rather, the Office notes that that Olden discloses "database processing" and that it must necessarily perform the tasks as recited in this claim.

Applicant respectfully disagrees with this conclusion. Applicant requests proof for the Office's inherency position.

Furthermore, even if the Office is right, that does not mean that "database processing" inherently includes the tasks recited in this claim in the manner that they are recited. For example, Applicant asks how it is possible inherent to Olden's "database processing" that it would "persist[] the credential into a database while maintaining the credential's association with the specified resource?"

As shown above, **Olden** does not disclose all of the claimed elements and features of the claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claim 33

This claim ultimately depends upon independent claim 32. As discussed above, claim 32 is allowable.

In addition to its own merits, this dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that

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the Office withdraw the rejection of this dependent claim because its base claim is allowable.

Claim 34

This claim for an application programming interface (API) method recites:

- **receiving a CredUI-promptfor-credentials call having a set of parameters comprising a TargetName, UserName, Password, and Flags;**
- **parsing the call to retrieve the parameters to determine a requesting application;**
- **obtaining a low-level credential from a user, wherein such credential includes a username and a password;**
- **returning the low-level credential to the requesting application.**

The Office cites col. 3, lines 39-61 and col. 9, line 27 through col. 10, line 36 of **Olden** and, by doing so, indicates that the cited portion of the reference discloses all of the elements and features of this claim.

However, the Applicant submits that the Office has not identified, with particularity, where each feature and element of this claim is found in the cited passage of the reference. Furthermore, the Office has not provided any reasoning, explanation, or rationale as to its assertion that the

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cited portions of **Olden** disclose all of each feature and element of this claim,

In particular, the Office has not identified, nor can Applicant find, where **Olden** discloses "receiving a CredUI-promptfor-credentials call having a set of parameters comprising a TargetName, UserName, Password, and Flags." No where does **Olden** disclose a call with these particular set of parameters.

In its "Response to Arguments" on pp. 7-8 of the Action, the Office responded to Applicant's argument with the following:

> In response to applicant's argument on page 35, with respect to claim 34 "In particular, the Office has not identified, nor can Applicant find, where Olden discloses "receiving a CredUI-promptfor-credentials call having a set of parameters comprising a TargetName, Context, AuthFlags and Flags". The Office disagrees the reference shows many examples of these steps, for exampled see col. 9, lines 27-51
>
> "During a request" same meaning as "CredUI-promptfor-credentials"
>
> "different application functions 84 to which the customer has access rights, and returns the correct interface which support the function set" has the same meaning as "set of parameters"
>
> see col. 17, line 65 through col. 18, lines 59 "Smart rules are filters that govern user access to applications. When a smart rule is defined for an application in order to determine authorization, the security and access management system 10 examines a property for a specific user, and grants or denies access to an application resource based on the value found" has the same meaning as "TargetName, Context, AuthFlags, and Flags"

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In response, Applicant points to the specificity of the claim recitation. In particular, this claim indicates that the received call has a defined set of parameters that comprise the following specifically recited parameters: "TargetName, UserName, Password, and Flags."

It appears to the Applicant that the Office is combining two extrapolated and generalized conclusions about Olden and equating it to a very specific and explicit recitation in the claim language. If the Office is correct then these two statements are equivalent:

The following is a direct quote from this claim:

> ...receiving a CredUI-promptfor-credentials call having a set of parameters comprising a TargetName, UserName, Password, and Flags...

The following is the same quoted language but Applicant has replaced the language that the Office equates to being disclosed in **Olden** (minor edits are done to make the replaced language make better grammatical sense):

> ... receiving a request [a CredUI-promptfor-credentials call] having a correct interface to support the function set to which the customer has access rights, [a set of parameters] comprising filters governed by smart rules (when a smart rule is defined for an application in order to determine authorization, the security and access management system examines the property of a specific user and grants or denies access to an application resource based

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on the value found) [a TargetName, UserName, Password, and Flags]...

Again, if **Olden** truly discloses the language recited in this claim, then the above two statements would be identical in meaning. Not only would they be identical they would be neither broader nor narrower than each other in meaning.

Applicant hopes that the reader of this can see that these two statements are not identical. Even assuming the best case for the Office, **Olden**, at best, discloses a generalization of the recited language. But, of course, Applicant does not think that **Olden** even discloses that.

Applicant asks the Office to identify, with particularity, where **Olden** discloses each of these parameters which have been expressly recited in this claim. Where does **Olden** expressly disclose a "TargetName" parameter? Where does **Olden** expressly disclose a "UserName" parameter? Where does **Olden** expressly disclose a "Password" parameter? Where does **Olden** expressly disclose a "Flags" parameter?

Furthermore, Applicant submits that **Olden** does not disclose the all of the steps of this method (parsing a call; obtaining a credential; associating; and persisting) generally or specifically. For example, **Olden** does not disclose "associating the [obtained] credential with the specified resource."

If **Olden** does disclose these things, Applicant asks that the Office identify where it discloses it with particularity.

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As shown above, **Olden** does not disclose all of the claimed elements and features of the claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claim 35

This claim ultimately depends upon independent claim 34. As discussed above, claim 34 is allowable.

In addition to its own merits, this dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of this dependent claim because its base claim is allowable.

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Obviousness Rejections

Lack of *Prima Facie* Case of Obviousness (MPEP § 2142)

Applicant disagrees with the Office's obviousness rejections. Arguments presented herein point to various aspects of the record to demonstrate that all of the criteria set forth for making a *prima facie* case have not been met.

Based upon Olden and McNabb

The Office rejects 3, 9, and 25 under USC § 103(a) as being unpatentable over **Olden** as modified by **McNabb**. Applicant respectfully traverses the rejections of these claims. Applicant asks the Office to withdraw its rejection of these claims.

These claims ultimately depend upon independent claims 1, 8, and/or 24. As discussed above, these claims are allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

Dependent Claims

In addition to its own merits, each dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each dependent claim where its base claim is allowable.

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Conclusion

All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Office is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

Dated: 5-26-05 By: _____

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